SEALED

Office of the United States Attorney
District of Nevada
333 Las Vegas Blvd., South, Ste. 5000
Las Vegas, Nevada 89101
(702) 388-6336

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DISTRICT OF NEVADA
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DANIEL G. BOGDEN
United States Attorney
SUSAN CUSHMAN
Assistant United States Attorney
333 Las Vegas Blvd., South, Suite 5000
Las Vegas, Nevada 89101
(702) 388-6336

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

SALEUMKIAT KAYARATH,
ARDIS VANFOSSAN,
CHAYPHET VORAVONG, and
JOHN TACORDA

Defendants.

SEALED CRIMINAL INDICTMENT

Case No.: 2:14-cr- 353

VIOLATIONS:
21 U.S.C. §§ 846, 841(a)(1),(b)(1)(A), (b)(1)(B, and (b)(1)(C) – Conspiracy to Distribute a Controlled Substance; 21 U.S.C. §§ 841(a)(1), (b)(1)(A),(B) and (C) – Possession with Intent to Distribute a Controlled Substance and Distribution of a Controlled Substance;
18 U.S.C. § 2 - Aiding and Abetting; and
18 U.S.C. §§ 1956(a)(1)(A)(i) and (h) – Money Laundering Conspiracy

THE GRAND JURY CHARGES THAT:

COUNT ONE

Conspiracy to Distribute a Controlled Substance

Beginning on a date unknown, but no later than on or about March 2013, and continuing up to and including October 29, 2014, in the State and Federal District of Nevada,

SALEUMKIAT KAYARATH,
ARDIS VANFOSSAN,
CHAYPHET VORAVONG
and JOHN TACORDA,

defendants herein, and others known and unknown to the grand jury, did knowingly and intentionally combine, conspire, confederate and agree with individuals known and unknown to distribute 50 grams or more of actual methamphetamine, a Schedule II controlled substance, 500 grams of more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, and a mixture or substance containing a detectable amount of 3,4-Methylenedioxymethamphetamine ("MDMA"), a Schedule I controlled substance all in violation of Title 21, United States Code, Sections 846 and 841(a)(1), (b)(1)(A)(viii), (b)(1)(B)(ii)(II), and (b)(1)(C) .

COUNT TWO
Possession with Intent to Distribute a Controlled Substance

On or about May 8, 2013, in the State and Federal District of Nevada,

SALEUMKIAT KAYARATH, and
ARDIS VANFOSSAN

defendants herein, aiding and abetting one another, knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii)(II) and Title 18 United States Code, Section 2.

COUNT THREE
Distribution a Controlled Substance

On or about May 14, 2013, in the State and Federal District of Nevada,

SALEUMKIAT KAYARATH, and
ARDIS VANFOSSAN

defendants herein, aiding and abetting one another, knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(viii).

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COUNT FOUR
Distribution of a Controlled Substance

On or about July 23, 2013, in the State and Federal District of Nevada,

**SALEUMKIAT KAYARATH,
ARDIS VANFOSSAN, and
CHAYPHET VORAVONG,**

defendants herein, aiding and abetting one another, knowingly and intentionally distributed a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT FIVE
Distribution of a Controlled Substance

On or about November 25, 2013, in the State and Federal District of Nevada,

**SALEUMKIAT KAYARATH, and
ARDIS VANFOSSAN**

defendants herein, aiding and abetting one another, knowingly and intentionally distributed 3,4-methylenedioxymethamphetamine, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT SIX
Distribution of a Controlled Substance

On or about January 30, 2014, in the State and Federal District of Nevada,

CHAYPHET VORAVONG,

defendant herein, knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(viii).

COUNT SEVEN
Distribution of a Controlled Substance

On or about July 15, 2014, in the State and Federal District of Nevada,

JOHN TACORDA,

defendant herein, knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT EIGHT
Distribution of a Controlled Substance

On or about October 14, 2014, in the State and Federal District of Nevada,

CHAYPHET VORAVONG,

defendant herein, knowingly and intentionally distributed 5 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(viii).

COUNT NINE
Money Laundering Conspiracy

Beginning on a date unknown, but no later than on or about May 2013, and continuing up to and including October 29, 2014, in the State and Federal District of Nevada,

SALEUMKIAT KAYARATH,
and ARDIS VANFOSSAN,

defendants herein, knowing that the property involved in financial transactions, as defined in Title 18, United States Code, Sections 1956(c)(4) and 1956(c)(3), affecting interstate commerce represented the proceeds of some form of unlawful activity, did combine, conspire, and agree to conduct such financial transactions, which, in fact, involved proceeds of specified unlawful activity, that is, conspiracy to distribute a controlled substance as charged in Count One of this

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Indictment, with the intent to promote the carrying on of the specified unlawful activity, in violation of Title18, United States Code, Sections 1956(a)(1)(A)(i).

All in violation of Title 18, United States Code, Section 1956(h).

DATED: this 29th day of October, 2014.

A TRUE BILL:

/S/
FOREPERSON OF THE GRAND JURY

DANIEL G. BOGDEN
United States Attorney

SUSAN CUSHMAN
Assistant United States Attorney